

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP

2 Sean Pak (Bar No. 219032)
seanpak@quinnemanuel.com
3 Melissa Baily (Bar No. 237649)
melissabaily@quinnemanuel.com
4 James Judah (Bar No. 257112)
jamesjudah@quinnemanuel.com
5 Lindsay Cooper (Bar No. 287125)
lindsaycooper@quinnemanuel.com
6 Iman Lordgooei (Bar No. 251320)
imanlordgooei@quinnemanuel.com
7 50 California Street, 22nd Floor
San Francisco, California 94111-4788
Telephone: (415) 875-6600
8 Facsimile: (415) 875-6700

9 Marc Kaplan (*pro hac vice*)
marckaplan@quinnemanuel.com
10 191 N. Wacker Drive, Ste 2700
Chicago, Illinois 60606
11 Telephone: (312) 705-7400
Facsimile: (312) 705-7401

12 *Attorneys for GOOGLE LLC*

13
14 SONOS, INC.,

15 Plaintiff,

16 vs.

17 GOOGLE LLC,

18 Defendant.

19 Case No. 3:20-cv-06754-WHA
20 Related to Case No. 3:21-cv-07559-WHA

21 **GOOGLE'S ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIAL
SHOULD BE SEALED**

22

23

24

25

26

27

28

1 **I. INTRODUCTION**

2 Pursuant to Civil Local Rule 79-5(f), Google LLC (“Google”) respectfully submits this
 3 Administrative Motion to Consider Whether Another Party’s Material Should Be Sealed in
 4 connection with its Motion *in Limine* No. 2 to Exclude Portions of the Expert Report and Certain
 5 Testimony of Mr. James Malackowski Regarding Damages (“Motion *in Limine* No. 2”). Certain
 6 portions of documents filed in support thereof contain information that Sonos, Inc. (“Sonos”) may
 7 consider confidential pursuant to the Stipulated Protective Order (“Protective Order”) entered by
 8 this Court. Dkt. 94. Accordingly, Google seeks to file under seal the documents and information
 9 as listed below:

Document	Portions to Be Filed Under Seal	Designating Party
Exhibit 1 to the Declaration of Lindsay Cooper in Support of Google’s Motion <i>in Limine</i> No. 2	Entire Document	Sonos
Exhibit 2 to the Declaration of Lindsay Cooper in Support of Google’s Motion <i>in Limine</i> No. 2	Entire Document	Sonos
Exhibit 3 to the Declaration of Lindsay Cooper in Support of Google’s Motion <i>in Limine</i> No. 2	Entire Document	Sonos
Exhibit A to the Declaration of Joseph Kolker in Support of Sonos’s Opposition to Google’s Motion <i>in Limine</i> No. 2 (“Exhibit A”)	Portions outlined in blue boxes	Sonos

20 Materials and documents may be provisionally filed under seal pursuant to Civil Local Rule
 21 79-5(f) when the document, or portions thereof, “has been designated as confidential by another
 22 party or non-party.” L.R. 79-5(f). Google has submitted exhibits in support of its Motion for Leave
 23 under seal because information therein may be considered “CONFIDENTIAL” and/or “HIGHLY
 24 CONFIDENTIAL—ATTORNEYS’ EYES ONLY” under the Protective Order by Sonos.
 25

26 In compliance with Civil Local Rule 79-5(d) and (e), an unredacted version of Exhibit A
 27 accompanies this Administrative Motion and a redacted version Exhibit A has been filed publicly.
 28 In accordance with Local Rule 79-5(c)(3), Google has also filed a Proposed Order herewith.

1 DATED: April 26, 2023

2 QUINN EMANUEL URQUHART & SULLIVAN,
3 LLP

4 By: /s/ Sean Pak
5 Sean Pak

6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Attorneys for GOOGLE LLC

CERTIFICATE OF SERVICE

2 Pursuant to the Federal Rules of Civil Procedure and Local Rule 5-1, I hereby certify that,
3 on April 26, 2023, all counsel of record who have appeared in this case are being served with a copy
4 of the foregoing via the Court's CM/ECF system and email.

6 DATED: April 26, 2023

By: /s/ Sean Pak
Sean Pak